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Attorney for Plaintiff  
CALIFORNIA ENVIRONMENTAL PROTECTION ASSOCIATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIA ENVIRONMENTAL  
PROTECTION ASSOCIATION, a California  
corporation,

Plaintiff,

vs.

SONOMA SOIL BUILDERS, INC, a  
California corporation, SHILOH OAKS  
COMPANY, LLC, a California limited  
liability company,

Defendants.

Case No.: 4:15-cv-04880-KAW

**NOTICE OF SETTLEMENT**

TO THE CLERK OF THE COURT, ANY INTERESTED PARTIES, AND THEIR  
ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff California Environmental Protection Association

("CEPA") and Defendants Sonoma Soil Builders, Inc. and Shiloh Oaks Company, LLC, Parties

in the above-captioned action, have reached a settlement and executed a Settlement Agreement.

The agreement is contingent upon the expiration of the federal agencies' 45-day review period.

1 PLEASE TAKE FURTHER NOTICE that, in accordance with Title 33 United States  
2 Code Section 1365(c), no judgment disposing of this action may be entered prior to 45 days  
3 following the receipt of the proposed consent agreement by the United States Department of  
4 Justice and the national and Region IX offices of the United States Environmental Protection  
5 Agency. *See* 40 C.F.R. § 135.5 (requiring the parties to provide notice to the court of the 45-day  
6 agency review period under 33 U.S.C. § 1365(c)).  
7

8 The regulatory agencies' review period will end on or about July 1, 2018; if any of the  
9 reviewing agencies object to the proposed agreement, the parties would require additional time to  
10 meet and confer and attempt to resolve the agencies' concerns. Consequently, the parties submit  
11 that good cause exists to set **July 15, 2018**, as the deadline for the filing of a Stipulation for  
12 Dismissal of Plaintiff's Claims with Prejudice, or a Notice that the settlement is null and void.  
13

14 Dated: May 11, 2018

Respectfully,

15  
16 By: /S/ Craig A. Brandt  
17 Craig A. Brandt  
18 Attorney for Plaintiff  
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**PROOF OF SERVICE**

I, Craig A. Brandt, hereby declare:

My business address is the Law Offices of Craig A. Brandt, 5354 James Avenue,  
Oakland, California 94618.

On May 11, 2018, I served the following document described as

**NOTICE OF SETTLEMENT**

By the ECF system to counsel for Defendant as follows:

Peter Simon  
Beyers Costin Simon, A Professional Corporation  
200 Fourth Street, Ste 400  
PO Box 878  
Santa Rosa, CA 95402-0878


[psimon@beyerscostin.com](mailto:psimon@beyerscostin.com)

Marlon V. Young  
Merrill, Arnone & Jones  
3554 Round Barn Boulevard, Suite 300  
Santa Rosa, CA 95303

[myoung@majlaw.com](mailto:myoung@majlaw.com)

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 14, 2018

  
By: /S/ Craig A. Brandt  
Craig A. Brandt  
Attorney for Plaintiff